

Librarian's Professional Certificate issued by the New York State Education Department.

2. In the course of my experience at the History Center, I have reviewed information and documents related to the Grumman UF and SA-16 (HU-16) Albatross. I have also consulted with former Grumman employees Robert Tallman and Thomas Griffin. Both Mr. Griffin and Mr. Tallman are former History Center volunteers

3. The book "Grumman Aircraft since 1929" by Rene J. Francillon is a very authoritative text that we rely upon at the History Center. I reviewed my copy of the book and noted that it referenced that with the Air Force Reserve, Albatrosses served with the 304th Air Rescue Squadron in Portland, Oregon.

4. I conducted a reasonable search of the documents and materials contained at the History Center to determine if any documents identified Grumman work on Albatross aircraft, correspondence, or communications with customers or military units in Oregon. Although I focused on the 1960-1969 time, I searched for any documents or materials (I did not review the thousands of uncatalogued photographic negatives) that would indicate that Grumman had any business or other connection to the State of Oregon. My search took approximately 8 hours and included the review of approximately 15.2 linear feet of Albatross materials. I did not identify or locate any records or documents reflecting any Grumman connection to Oregon with respect to the Albatross aircraft.

5. Similarly, I did not identify or locate any documents indicating that Grumman was directly involved in the training of service members in Oregon with respect to the ongoing maintenance of brakes, engines, or other components on its Albatross aircraft after delivery.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on February 11, 2021, in Bethpage, New York.


PAMELA EVE GRIFFIN-HANSEN

DECLARATION OF PAMELA EVE GRIFFIN-HANSEN

CERTIFICATE OF SERVICE

I hereby certify that on the date noted below **DECLARATION OF PAMELA EVE GRIFFIN-HANSEN** was electronically filed with the Clerk of the Court of the United States District Court, District of Oregon using the ECF system which sent notification of such filing to all counsel of record. This document is now available for viewing and downloading from the ECF system.

DATED this 11th day of February, 2021.

TUCKER ELLIS LLP

By: /s/ Anna Villanueva
Anna Villanueva, Assistant to
Daniel J. Kelly *Pro Hac Vice* (CASB 145088)
Email: daniel.kelly@tuckerellis.com
Of Attorneys for Defendant
Northrop Grumman Systems Corporation